

1 KAUFMAN LLC  
2 ALAN H. KAUFMAN  
3 445 Park Avenue  
4 New York, New York 10022  
5 Telephone: 646-820-6550  
6 Facsimile: 646-820-6568  
7 Appearing Pro Hac Vice

8 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP  
9 A Limited Liability Partnership  
10 Including Professional Corporations  
11 ROBERT J. STUMPF, JR., Cal. Bar No. 72851  
12 rstumpf@sheppardmullin.com  
13 Four Embarcadero Center, 17th Floor  
14 San Francisco, California 94111-4109  
15 Telephone: 415-434-9100  
16 Facsimile: 415-434-3947

17 Attorneys for Plaintiff Suzanne D. Jackson

18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SUZANNE D. JACKSON,

Case No. CV 11-2753 JSW

Plaintiff,

v.

WILLIAM FISCHER, JON SABES, STEVEN SABES, DAVID GOLDSTEEN, MARVIN SIEGEL, BRIAN CAMPION, LONNIE BOOKBINDER, CHETAN NARSUDE, MANI KOOLASURIYA, JOSHUA ROSEN, UPPER ORBIT, LLC, SPECIGEN, INC., PEER DREAMS INC., NOTEBOOKZ INC., ILEONARDO.COM INC., NEW MOON LLC, MONVIA LLC, and SAZANI BEACH HOTEL,

**JOINT STIPULATION PURSUANT TO FED. R. CIV. P. 15, L.R. 6-1 (b) and 6-2 TO:**

**(1) FILE FIRST AMENDED COMPLAINT;  
(2) EXTEND THE DATE BY WHICH DEFENDANTS MUST RESPOND TO FIRST AMENDED COMPLAINT;**

**AND DECLARATION OF ROBERT J. STUMPF JR. IN SUPPORT THEREOF**

**ORDER THEREON**

Defendant.

## **STIPULATION**

Pursuant to Federal Rule of Civil Procedure 15(a)(2) and Civil L.R. 6-1(b), 6-2, and 7-12, it is hereby stipulated by and between the parties, through their respective attorneys, that:

(1) Plaintiff Suzanne Jackson ("Jackson") may file her First Amended Complaint in this action on or before December 2, 2011.

(2) Instead of the period of time set by Federal Rule of Civil Procedure 15(a)(3) for responding to an amended pleading, Defendants William Fischer, Upper Orbit LLC, Jon Sabes, Steven Sabes, Marvin Siegel, Mani Koolasuriya, Monvia LLC, Chetan Narsude and New Moon LLC ("Defendants") shall answer or otherwise respond to the First Amended Complaint on or before January 13, 2012.

11 (3) Defendants hereby waive notice and service of the First Amended Complaint.

12 (4) Defendants William Fischer and Upper Orbit LLC shall withdraw their Motion to  
13 Dismiss (Doc. #40), filed on October 11, 2011, by filing a notice of withdrawal within five court  
14 days of the filing of this Stipulation.

15 (5) Defendants Jon Sabes, Steven Sabes and Marvin Siegel shall withdraw their  
16 Motion to Dismiss (Doc. #39), filed on October 11, 2011, by filing a notice of withdrawal within  
17 five court days of the filing of this Stipulation.

18 (6) Defendants Mani Koolasuriya, Monvia LLC and Chetan Narsude shall withdraw  
19 their Motion to Dismiss (Doc. #42), filed on October 11, 2011, by filing a notice of withdrawal  
20 within five court days of the filing of this Stipulation.

22 | Dated: November 28, 2011

/s/ Robert J. Stumpf, Jr.

Robert J. Stumpf, Jr.

SHEPPARD MULLIN RICHTER & HAMPTON LLP  
Attorneys for Plaintiff Suzanne Jackson

24 Dated: November 28, 2011

/s/ Peter C. McMahon

Peter C. McMahon

Peter C. McMahon  
MCMAHON SEREPCA LLP

MEMORANDUM SERIALIZED  
Attorneys for Defendants William Fischer and Upper Orbit, LLC

1 Dated: November 28, 2011

/s/ Tanya Herrera

Tanya Herrera

STEIN & LUBIN LLP

Attorneys for Defendants Jon Sabes, Steven Sabes,  
and Marvin Siegel

4 Dated: November 28, 2011

/s/ Tom Chia-Kai Wang

Tom Chia-Kai Wang

LAW OFFICES OF TOM CHIA-KAI WAING

Attorneys for Defendants Chetan Narsude, Mani  
Kulasooriya, and Monvia LLC

7 Dated: November 28, 2011

/s/ Nancy Gruver

Founder

Defendant New Moon LLC

10

11 **Filer's Attestation:** Pursuant to General Order No. 45, Section X(B) regarding signatures, Robert  
12 J. Stumpf, Jr. hereby attests that concurrence in the filing of this document has been obtained.

13

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

14

15

Dated: November 29, 2011



The Hon. Jeffrey S. White

16

17

18

19

20

21

22

23

24

25

26

27

28